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November 6, 1997

VIA HAND DELIVERY

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

NOV - 6 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Application by BellSouth Telecommunications, Inc. for Provision of
In-Region, InterLATA Service, CC Docket No. 97-208**

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Federal Communications Commission's rules, 47 C.F.R. § 1.1206, I am notifying the Commission that this morning, November 6, 1997, representatives of Intermedia Communications Inc. met with several members of the Commission's Common Carrier Bureau. In attendance were Julia Strow and Mike Viren, Intermedia; Jonathan Canis and Enrico Soriano, Kelley Drye & Warren LLP; and Michael Pryor, Robert Tanner, Audrey Wright, and Jeannie Su, Common Carrier Bureau.

Intermedia discussed several issues, including BellSouth's wholesale support processes, particularly access to BellSouth's operations and support systems and the inadequacy of BellSouth's automated interfaces; Intermedia's experience with respect to BellSouth's inability to process orders for unbundled loops and resale services; performance measures and surveillance reporting requirements; and the payment of reciprocal compensation for local calls terminated to Internet service providers located on Intermedia's network. Intermedia handed out a seven-page presentation material, which outlines the issues set forth above. A copy of that presentation material is attached to this notice.

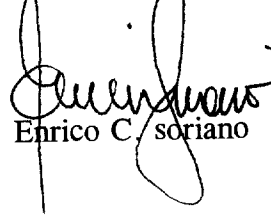
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KELLEY DRYE & WARREN LLP

William F. Caton
November 6, 1997
Page 2

In conformity with the Commission's *ex parte* rules, an original and one copy of this notice are being provided for inclusion in the public record.

Very truly yours,



Enrico C. Soriano

encl.

cc: Michael Pryor (w/ encl.)
Robert Tanner (w/ encl.)
Audrey Wright (w/ encl.)
Jeannie Su (w/ encl.)
Mike Viren (w/ encl.)
Julia Strow (w/ encl.)
Jonathan Canis (w/ encl.)

ABOUT INTERMEDIA COMMUNICATIONS INC.

- One of the country's largest and fastest growing competitive local exchange carriers, providing a full range of local and long distance services to business and government end-users, long distance carriers, information service providers, resellers, and wireless carriers.
- Provides voice, data, and video services; local and long distance switched services; access services; and data services, including frame relay, ATM, and Internet services.
- In South Carolina, Intermedia:
 - Has approximately 400 resold access lines; four (4) Cascade data switches located in Columbia, Greenville, Florence, and Charleston; and 125 data circuits.
 - Plans to deploy a Nortel DMS 500 voice switch and an ATM switch in Greenville in 3Q 1998.

INTERMEDIA'S ACTUAL EXPERIENCE DEMONSTRATES THAT BELL SOUTH IS NOT PROVIDING UNBUNDLED NETWORK ELEMENTS AS REQUIRED

- The 1996 Act contemplates the provision of a whole spectrum of competitive local services by BellSouth, including voice, data, and video. The interconnection agreement between Intermedia and BellSouth also contemplates the provision of data services.
- Intermedia requested 56/64 kbps digital loops (equivalent to the loops BellSouth provides to itself for frame relay service) fifteen months ago; despite BellSouth's commitment to provide the loops, the loops have yet to be provisioned.
- BellSouth's South Carolina Statement of Generally Available Terms and Conditions does not list the digital loops requested by Intermedia.
- Recent statements from BellSouth suggest that BellSouth may be reneging on its commitment to Intermedia to provide unbundled data loops.

INTERMEDIA'S ACTUAL EXPERIENCE INDICATES THAT BELLSOUTH CANNOT PROCESS ORDERS FOR DIGITAL UNBUNDLED LOOPS OR RESALE SERVICES

- Intermedia submitted an order for a DS1 loop in May of 1997. Despite fully adhering to BellSouth's suggested ordering process, Intermedia encountered several problems that led to major delays. It took BellSouth six weeks to complete the order, as compared to one or two weeks required to provision a comparable DS1 retail service.
- When Intermedia complained, BellSouth gave assurances to Intermedia that the problems had been fixed, and that BellSouth was prepared to deliver DS1 loops in a timely manner. When Intermedia submitted a second order in October for an unbundled DS1 loop, however, Intermedia encountered exactly the same problems that delayed the first DS1 loop.

INTERMEDIA'S ACTUAL EXPERIENCE DEMONSTRATES THAT BELLSOUTH'S WHOLESALE SUPPORT PROCESSES ARE DEFICIENT AND DISCRIMINATORY

- BellSouth's Operations Support Systems ("OSS") interfaces are inadequate and discriminatory. In particular, BellSouth's interfaces are integrated, whereas the interfaces offered to competitive local exchange carriers ("CLECs") are separate. Also, BellSouth's OSS interfaces require manual "cut-and-paste". The deficiencies are too many to mention here.
- BellSouth's PC EDI system is restricted to single users and cannot support complex service orders, as well as move, add, and change orders. It is also incapable of handling on-screen edits.
- Throughout the BellSouth region, Intermedia has placed 552 service orders. Of these, 204 orders--37%--have not even been acknowledged (including orders dating as far back as August 9). In South Carolina, Intermedia submitted orders for 16 resale services. Of these, 4 of the orders--25%--have not even been acknowledged.
- BellSouth has no formal processes in place for informing competing carriers of changes in OSS interfaces.
- BellSouth has publicly acknowledged that it does not meet the FCC's OSS requirements.

- BellSouth's own commissioned study unequivocally demonstrates that BellSouth's ordering and related systems provide inferior service to competing carriers.

BELLSOUTH DOES NOT HAVE ADEQUATE PERFORMANCE MEASURES

- There are no comparative empirical data demonstrating that BellSouth's Local Carrier Service Center's ("LCSC") performance is at parity or comparable with the performance of BellSouth's organizations that process BellSouth's retail orders (e.g., Data Service Center).
- There are no comparative empirical data demonstrating that BellSouth's retail OSS interfaces and the CLEC OSS interfaces are comparable.
- There are no data concerning actual installation intervals (for both voice and data services).
- BellSouth does not provide surveillance reports.

BELLSOUTH VIOLATES ITS INTERCONNECTION AND MUTUAL COMPENSATION OBLIGATIONS

- BellSouth has informed Intermedia and other CLECs that it will no longer pay mutual compensation for local calls terminated to Internet service providers ("ISPs") located on Intermedia's network.
- BellSouth's unilateral decision violates its interconnection agreement with Intermedia.
- BellSouth's unilateral action violates the provisions of the Telecommunication Act of 1996 relating to interconnection and mutual compensation.
- Until BellSouth compensates CLECs for ISP-bound local traffic, BellSouth has not met its Section 271 obligations.



Delinquency Report As Of: 11/6/97

Stacey Miller

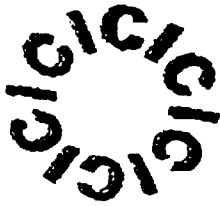
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2025673		9/24/97	9/26/97	9/29/97	3
2025555		10/1/97	10/3/97		
2025555a		10/1/97	10/3/97		
2025555b		10/1/97	10/3/97		
2026187		10/3/97	10/7/97		
2011483a		10/3/97	10/7/97		
2026433		10/6/97	10/8/97	10/9/97	1
2025945		10/6/97	10/8/97	10/13/97	5
2026186b		10/10/97	10/13/97	10/15/97	2
2026186a		10/10/97	10/13/97		
2026186		10/10/97	10/13/97	10/15/97	2
2016133a		10/15/97	10/17/97	10/20/97	3
2025564b		10/22/97	10/24/97	10/27/97	3
2025564a		10/22/97	10/24/97	10/27/97	3
2025564c		10/22/97	10/24/97	10/27/97	3
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Delinquency Report As Of: 11/6/97

Stacey Miller

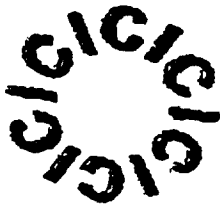
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2025337b		10/30/97	11/3/97	11/5/97	2



Delinquency Report As Of: 11/4/97

Kara Hardway

PON #	BTN	Date Sent	Due Date	Date Recv'd	Days Late
2017650		8/14/97	8/16/97		
2022145		8/18/97	8/20/97	8/25/97	5
2021065		8/18/97	8/20/97		
2024689		8/29/97	8/31/97		
2025402		9/8/97	9/10/97		
2025596		9/16/97	9/18/97	9/22/97	4
2025586		9/16/97	9/18/97	9/24/97	6
2025600		9/16/97	9/18/97	9/23/97	5
2025583		9/16/97	9/18/97	9/23/97	5
2025585		9/17/97	9/17/97	9/24/97	7
2025773		9/17/97	9/19/97	9/22/97	3
2025866		9/24/97	9/26/97	9/29/97	3
2025819		9/24/97	9/26/97	9/29/97	3
2025831		9/24/97	9/26/97	9/29/97	3
2025821		10/2/97	10/4/97	10/10/97	6
2026268		10/3/97	10/5/97	10/13/97	8
2016934X		10/8/97	10/10/97	10/13/97	3
2021065X		10/8/97	10/10/97		
2017650X		10/8/97	10/10/97		



Delinquency Report As Of: 11/4/97

Kara Hardway

PON #	BTN	Date Sent	Due Date	Date Recv'd	Days Late
2022145X		10/9/97	10/11/97		
2026646		0/14/97	10/16/97	10/21/97	5
2026544		0/14/97	10/16/97		
2026594		0/14/97	10/16/97	10/21/97	5
2026652		0/15/97	10/17/97		
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2026561		0/21/97	10/23/97		
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2026809		0/21/97	10/23/97		
2026807		0/21/97	10/23/97		
2025457		0/23/97	10/25/97	10/27/97	2
2026969		0/23/97	10/25/97	10/29/97	4
2026971		0/24/97	10/26/97	10/28/97	2
2027077		0/29/97	10/31/97		
2027092		0/29/97	10/31/97		